

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

**MARLON BOWLES**

**Plaintiff,**

**vs.**

**ABBVIE INC.,**

**Defendant.**

)  
)  
)  
)  
)  
)  
)  
)  
)  
)  
)

**Cause No: 1:20-cv-07413**

**UNOPPOSED MOTION FOR EXTENSION OF BRIEFING DEADLINES**

**COMES NOW**, Plaintiff Marlon Bowles, by and through his undersigned counsel and files this Unopposed Motion for Extension of Briefing Deadlines and hereby request this Court grant additional time to file Plaintiff's response and Defendant AbbVie, Inc's reply briefs, and states:

1. Defendant AbbVie, Inc.'s Motion to Dismiss Plaintiff's Second Amended Complaint [Dkt. No. 40] was filed on May 13, 2021.
2. Deadline for the Plaintiff to file his response to Defendant AbbVie, Inc's Motion to Dismiss Plaintiff's Second Amended Complaint be moved from May 27, 2021 to **June 28, 2021**.
3. Deadline for Defendant AbbVie, Inc. to file any reply to Plaintiff's Response to Defendant AbbVie, Inc.'s Motion to Dismiss Plaintiff's Second Amended Complaint be moved from June 10, 2021 to **July 16, 2021**.
4. Counsel for Plaintiff has conferred with opposing counsel, who has no objection to the relief sought.

5. This Court is permitted to enlarge the time period allowed for filing pleadings pursuant to FED. R. CIV. P. 6(b). Plaintiff submits that no party will be prejudiced by the granting of a brief extension. Based on the discussions of the Parties, if the Court grants this motion, there may be no need ultimately to file a response.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that this Court exercise its discretion by allowing the parties to extend the current briefing deadlines as set forth above and grant such other relief to which they may be entitled.

Dated: May 25, 2021

Respectfully Submitted,

**VAN WEY, PRESBY & WILLIAMS, PLLC**

BY: /s/ Ellen A. Presby  
Ellen A. Presby (admitted *pro hac vice*)  
Texas Bar No. 16249600  
Susan Allen (admitted *pro hac vice*)  
Texas Bar No. 01059350  
Emma C. Martin  
Texas Bar No. 24104999  
12720 Hillcrest Road, Suite 600  
Dallas, Texas 75230  
(214) 329-1350 Phone  
(800) 582-1042 Facsimile  
[courtfilings@vwpwlaw.com](mailto:courtfilings@vwpwlaw.com)  
[ellen@vwpwlaw.com](mailto:ellen@vwpwlaw.com)  
[susan@vwpwlaw.com](mailto:susan@vwpwlaw.com)  
[emma@vwpwlaw.com](mailto:emma@vwpwlaw.com)

**AND**

**THE LAW OFFICE OF KEITH ALTMAN**

BY: /s/ Keith Altman

Keith Altman (admitted *pro hac vice*)  
California Bar No. 257309  
33228 W. 12 Mile Road, Suite 375  
Farmington Hills, MI 48334  
(516) 456-5885 Phone  
[kaltman@lawampmmt.com](mailto:kaltman@lawampmmt.com)

**COUNSEL FOR PLAINTIFF**

**CERTIFICATE OF CONFERENCE**

Counsel for Plaintiff, Ellen Presby, has conferred with Counsel for Defendant regarding the substance of this Unopposed Motion for Extension of Briefing Deadlines. Counsel for Defendant is in agreement with the Proposed Briefing Schedule.

/s/ Ellen A. Presby  
Ellen A. Presby